

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STAVANGER HOLDINGS, LTD and KARL
ANDERSEN,

Plaintiffs,

vs.

TRANEN CAPITAL, LTD, TRANEN CAPITAL
ALTERNATIVE INVESTMENT FUND, LTD.,
THE LEO GROUP, LLC, KENNETH A.
LANDGAARD, and ARTHUR L. BOWEN,

Defendants.

Civil Action No.: 12 - 00646 (WTL)(DKL)

**PLAINTIFFS' MOTION TO COMPEL DISCOVERY
FROM THE TRANEN DEFENDANTS**

Plaintiffs Stavanger Holdings, Ltd. and Karl Andersen (collectively, the "Plaintiffs"), by and through their attorneys, Faegre Baker Daniels LLP and Duane Morris LLP, move pursuant to Rule 37 of the Federal Rules of Civil Procedure, to compel Defendants Tranen Capital Ltd., Tranen Capital Alternative Investment Fund, Ltd., Kenneth A. Landgaard and Arthur L. Bowen (collectively, the "Tranen Defendants" or "Tranen") to provide complete responses to Plaintiffs' First Request For the Production of Documents.

The documents requested are all relevant to this lawsuit and the only Tranen Defendant to produce any documents so far is Defendant Bowen, who has produced a mere 49 pages of emails. This response does not come close to satisfying Tranen Defendants' discovery obligations under the Federal Rules of Civil Procedure.

WHEREFORE, Plaintiffs move, pursuant to Federal Rule of Civil Procedure 37, for an order compelling Tranen Defendants to produce all documents responsive to Plaintiffs' First

Request For the Production of Documents, and for all other just and proper relief, including attorneys' fees incurred to file this motion.

Dated: August 7, 2013
Indianapolis, IN

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*Attorneys for Plaintiffs Stavanger Holdings, Ltd.
and Karl Andersen*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all of the parties who have subscribed to the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Ryan M. Hurley

Ryan M. Hurley